



**UNITED STATES ENVIRONMENTAL PROTECTION
AGENCY
REGION 10**

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REGIONAL
ADMINISTRATOR'S
DIVISION

March 11, 2021

Nathan L. Rumsey
Commanding Officer
U.S. Coast Guard
P.O. Box 25517
Juneau, AK 99802

Dear Mr. Rumsey:

The U.S. Environmental Protection Agency has reviewed the U.S. Coast Guard Draft Supplemental Environmental Assessment for the proposal to demolish two waterfront structures at Base Kodiak on the Nyman Peninsula in Womens Bay, Kodiak, Alaska (EPA Region 10 Project Number: 21-0013-USCG). We are providing our comments pursuant to Section 309 of the Clean Air Act and the National Environmental Policy Act.

The Draft Supplemental Environmental Assessment evaluates potential environmental impacts associated with the proposed action and no action alternative. Under the proposed action, the USCG will demolish the Marginal Wharf and remnant concrete structures that supported the old power plant's seawater intake. Under the no action alternative, the existing facilities would continue to degrade without maintenance, posing risks to the environment, navigation, and human health and safety. EPA supports the proposed action to demolish both waterfront structures, while minimizing adverse impacts on environmental resources within the analysis area.

EPA recognizes the USCG's work with the U.S. Fish and Wildlife Service and National Oceanic and Atmospheric Administration to ensure the proposed action would avoid significant impacts or reduce potential impacts to less than significant levels. EPA recommends bolstering sections on air quality, environmental justice, and biological resources to further improve this assessment.

EPA appreciates the opportunity to review this Draft Supplemental Environmental Assessment. If you have questions about our comments, please contact David Magdangal of my staff at (206) 553-4044 or Magdangal.David@epa.gov.

Sincerely,

Rebecca Chu, Branch Chief
Policy and Environmental Review Branch

U.S. Environmental Protection Agency Comments on the Draft Supplemental Environmental Assessment for the Kodiak Waterfront Demolition Projects Kodiak, Alaska

Air Quality

Demolition of the 208 square foot building on Marginal Wharf triggers EPA's emission control requirements also known as "work practice standards". These requirements control asbestos emissions for demolition operations under the Asbestos National Emission Standards for Hazardous Air Pollutants (40 C.F.R., Part 61, Subpart M.). Any combined amount of regulated asbestos containing material of at least 160 square feet must comply with the emission-control requirements for demolitions. We therefore recommend disclosure of all procedures planned for asbestos emission control, including: (1) an analysis of a worst-case scenario involving an accidental release of all asbestos to air and/or water; (2) measures to mitigate such a release; and (3) plans for emergency response, public notification, and pollutant removal if such a release were to occur.

Environmental Justice

EJSCREEN¹ results indicate that a one-mile buffer around the project area is 6% under the age of five and is at the 99th national percentile. This means that 6% of the area's population is under the age of five and is an equal or higher percent than where 99% of the national population lives. Demographic indicators in EJSCREEN are a way to indicate which communities may be more susceptible to a given level of exposure to environmental pollutants. For example, children are often more vulnerable to pollutants than adults due to differences in behavior and biology, which can lead to greater exposure and/or unique windows of susceptibility during development. EPA recommends addressing the potential levels, risks, and routes of exposure to those under the age of five. We also recommend disclosing and discussing potential impacts to affected communities and solicit additional input from the public. The Final EA should identify who in the potentially impacted minority and/or low-income communities the agency communicated with and when the public became involved in the process.

Biological Resources

The proposed project may impact endangered, threatened or candidate species listed under the Endangered Species Act or the Marine Mammal Protection Act and their habitats. EPA finds the assessments of these resources to be clear and thorough; we also recognize the long-term beneficial impacts of removing the hazardous materials associated with the deteriorating Marginal Wharf and seawater intake from the ecosystem. We recommend including the final mitigation measures that have been decided upon once the Biological Assessment has been reviewed by the USFWS and NOAA Fisheries and their concurrence with your determinations has been accepted.

¹ <https://ejscreen.epa.gov/mapper/>